

Douglas J. Minster  
**Atlantic Tele-Network, Inc.**  
Vice President  
Government and Regulatory Affairs  
[dminster@atni.com](mailto:dminster@atni.com)

July 27, 2012

By Electronic Filing  
Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, D.C. 20554

Re: WC Docket No. 09-197; Application of NTUA Wireless, LLC for  
Designation as an Eligible Telecommunications Carrier (“ETC”) for the  
Navajo Nation Reservation

Dear Ms. Dortch:

On July 25, 2012, Wade McGill, Rohan Ranaraja and I, on behalf of NTUA Wireless, LLC (“NTUA Wireless”), met with Trent Harkrader, Joseph Cavender and Alexander Minard of the Telecommunications Access Policy Division of the FCC’s Wireline Competition Bureau. Messrs. McGill and Ranaraja represent Allied Wireless Communications Corporation (“Allied Wireless”), an affiliate of which is the managing partner of NTUA Wireless. NTUA Wireless is majority-owned by the Navajo Tribal Utility Authority—a Navajo Nation enterprise (*i.e.*, an arm of the Navajo Nation government). I represent Atlantic Tele-Network, Inc., the parent company of Allied Wireless.

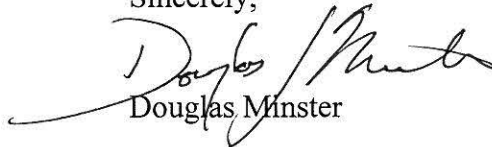
During that meeting, we discussed the status of NTUA Wireless’ unopposed pending ETC application for both high-cost and low-income support, which was filed on March 3, 2011. We repeated the discussion contained in the NTUA Wireless ETC application as to the significant public interest benefits of the grant of this unopposed ETC application. We highlighted the fact that the ETC application remains unopposed, and that it has been pending at the Commission for almost seventeen months now.

In our presentation, we also emphasized that the Commission has scheduled the Mobility Fund Phase I auction (Auction No. 901) for September 27, 2012, and that there are major tasks that a potential bidder must complete internally before deciding whether to bid on any particular bidding unit as well as deciding the amount to bid. We further discussed that under Section 54.1005(b)(2)(iii) of the Rules, a winning bidder in that auction must include, in its post-auction long-form application, which is due only ten days after winning bids are announced, proof that it already has been granted ETC status by either the FCC or a state public utilities commission, and that winning bidders that fail to make that showing timely are not permitted to amend later to do so.

We explained that in light of the significant tasks preceding the auction and those that may be required after the auction winners are announced, the Bureau must act immediately on NTUA Wireless' pending ETC application. Failure to do so could effectively disqualify NTUA Wireless from participating in the auction.

Finally, we highlighted for the Commission staff the fact that the staff has recently granted several ETC applications filed by other would-be participants in the auction, even though those other applications were filed after NTUA Wireless filed its ETC application, in order to enable those entities to participate in the auction. NTUA Wireless, as a tribal entity, was permitted to file an application for Auction 901 without proof that it has been granted ETC status. Nevertheless, if NTUA Wireless is not qualified to bid, it is irrelevant that it was permitted to file a short-form application. Moreover, it is difficult for NTUA Wireless to confidently plan for its Navajo-related projects that rely on low-income support without a grant of ETC status. In order to avoid disparate treatment of similarly-situated entities, we would appreciate immediate attention to the pending application.

Sincerely,



Douglas Minster

cc (all via e-mail):

Trent Harkrader  
Joseph Cavender  
Alexander Minard  
Wade McGill  
Rohan Ranaraja